

Date	Attorney	Hours	Bill Rate	Amount	Memo
11/2/2022	DL	0.8	\$450.00	\$360.00	Review ECF bounce with USDJ Order denying motion for attorneys' fees, conference with atty regarding same; consent letter motion for extension of time to file letter response in opposition and concerning extension of time for Vito to respond to complaint.
11/3/2022	DL	0.2	\$450.00	\$90.00	Review ECF bounce from Court with USDJ Order granting extension of time to file letter response in opposition to letter motion for pre-motion conference and extending Vito's deadline to respond to complaint; correspondence with atty regarding [REDACTED]; ; conference with atty regarding strategy;
11/4/2022	DL	0.5	\$450.00	\$225.00	Conference call with attorneys
11/4/2022	DL	0.6	\$450.00	\$270.00	Correspondence with attys regarding strategy ; review reply correspondence, conference with attys regarding strategic developments; review reply correspondence and discuss with attys,
11/7/2022	DL	0.6	\$450.00	\$270.00	conference call withattys
11/9/2022	DL	0.5	\$450.00	\$225.00	; conference with attys, review correspondence with forensic analyst regarding production.
11/10/2022	DL	0.5	\$450.00	\$225.00	Correspondence with attys regarding Defendants' property for sale; conference with attys regarding GPS device; conference and correspondence with private investigator regarding same; review letter re defamation claiml; conference with attys regarding same and private investigator;review correspondence with private investigator providing authorization to move forward with investigation;
11/11/2022	DL	0.4	\$450.00	\$180.00	review Correspondence with forensic analyst regarding update; correspondence and conference with atty re forensic analyst; review ECF bounce from opposing counsel with reply letter regarding defamation claim; correspondence with attys regarding same; review correspondence with private investigator regarding authorization, investigation, and requested information and logistics
11/12/2022	DL	0.2	\$450.00	\$90.00	orrespondence with Roa, attys, and private investigator regarding canvas; conference with private investigator and attys; review and discussions with attys regarding videos found by Roa.
11/13/2022	DL	0.1	\$450.00	\$45.00	Correspondence with private investigator and attys regarding status of investigationl.
11/14/2022	DL	0.1	\$450.00	\$45.00	E-mail correspondence withattorneys regarding contempt motion

11/14/2022	DL	0.3	\$450.00	\$135.00	Correspondence with private investigator and attorneys regarding Dropbox link for video; correspondence with expert witness support Teklicon; review correspondence with JMK and private investigator regarding OneDrive link for video upload; correspondence with attorneys regarding affidavit from [REDACTED]; conference with attorneys regarding next steps and various developments with case.
11/15/2022	DL	0.3	\$450.00	\$135.00	; review calls from private investigator; correspondence and conference with private investigator regarding developments with investigation; correspondence with client regarding exhibits to affidavit of [REDACTED]
11/16/2022	DL	0.5	\$450.00	\$225.00	Correspondence with attorneys regarding photos for [REDACTED] affidavit; correspondence with attorneys regarding response from GoDaddy regarding subpoena and payment for same; review correspondence with Roa and private investigator regarding investigation and termination thereof; correspondence with attorneys regarding same; conference with attorneys regarding same and private investigator; l.
11/17/2022	DL	0.5	\$450.00	\$225.00	conference with private investigator regarding proposal to return to case; review video footage; correspondence with private investigator regarding conference; conduct conference with private investigator regarding case; conference with private investigator regarding strategy; correspondence with Shalit, Roa, and attorneys regarding action for pre-suit discovery; conference with attorneys regarding case; review correspondence with forensic analyst regarding discovery; review correspondence with private investigator regarding contact information for assigned detective.
11/19/2022	DL	0.1	\$450.00	\$45.00	Correspondence and conference with private investigator regarding detective and returning to investigation; conference with attorneys regarding same.
11/20/2022	DL	0.1	\$450.00	\$45.00	review Correspondence with with detective regarding case; .

11/21/2022	DL	1.5	\$450.00	\$675.00	Conference and correspondence with Shalit regarding joint defense agreement and criminal investigation of GPS device; review correspondence with forensic analyst and opposing counsel regarding conference; review and accept calendar invitation for virtual meeting; calendar virtual meeting; conduct virtual meeting with forensic analyst and opposing counsel; review ECF bounce from Court with USDJ Order scheduling pre-motion conference; review correspondence with all counsel of record and USMJ Cho concerning adjournment of conference today and inability to access conference; correspondence and conference with attorneys regarding forensic analyst virtual meeting and next steps; review correspondence with forensic analyst regarding invoice; correspondence and conference with attorneys regarding virtual meeting to review forensic analyst's needs; conduct virtual meeting withattys; correspondence with attys regarding need to compare both customer lists and provide domains for firms outside of 2016 list.
11/23/2022	DL	0.2	\$450.00	\$90.00	review E-mail correspondence regarding C. Roa
11/23/2022	DL	0.6	\$450.00	\$270.00	reviewft joint cooperation agreement; correspondence with attys and, Roa, JSF, regarding communication to private investigator; review correspondence with private investigator regarding release and request for same from Roa.
11/24/2022	DL	0.1	\$450.00	\$30.00	Correspondence with counsel for Roa regarding [REDACTED] correspondence with counsel for Roa, RFM, JSF, and client regarding emails exchanged with private investigator regarding [REDACTED]
11/29/2022	DL	0.3	\$450.00	\$135.00	Correspondence with atty regarding domain name list to be sent to forensic analyst, payment to forensic analyst, and first production of documents by forensic analyst; correspondence with private investigator and attys regarding conference; ; correspondence with [REDACTED];il; review correspondence from forensic analyst with invoice; correspondence with private investigator and attys regarding [REDACTED] [REDACTED]
11/30/2022	DL	0.7	\$450.00	\$315.00	Conference with private investigator regarding case (x2); correspondence with attys regarding Defendants' violation of temporary restraining Order; correspondence with attys re invoice from forensic analyst; review correspondence with forensic analyst regarding submission of same; review correspondence with forensic analyst regarding balances due and request for statement of account; review correspondence with forensic analyst and attys regarding same; review correspondence with private investigator regarding video enhancement; review consent letter motion and proposed scheduling Order;

12/1/2022	DL	0.6	\$450.00	\$270.00	Correspondence with attys regarding Defendants' contempt; correspondence with attys regarding forensic analyst's failure to produce documents; correspondence with attys regarding Roa; review ECF bounce from Court with USDJ Order granting extension of time to complete discovery; conference with Shalit and client [REDACTED]; correspondence with client regarding [REDACTED] revise joint cooperation agreement and submit same to Shalit, client, and JSF via email; correspondence with Roa, private investigator, Shalit, and client regarding waiver; forward same to JSF via email with correspondence regarding same; correspondence with client regarding invoice from forensic analyst; correspondence and conference with private investigator regarding NYPD Detective's findings concerning Staten Island private investigator; correspondence with JMK regarding meeting; draft preservation letter to Land Sea Air and submit same to Shalit and JMK via email; forward same to client, private investigator, and JSF via email.
12/2/2022	DL	0.1	\$450.00	\$30.00	Review correspondence from Shalit with executed counterpart to joint cooperation agreement; review correspondence from attys with executed counterpart; review reply correspondence from Shalit regarding same;
12/3/2022	DL	0.1	\$450.00	\$45.00	Update calendared deadline to complete all fact discovery; review reply correspondence from JSF regarding same.
12/4/2022	DL	0.1	\$450.00	\$45.00	Correspondence with attys regarding case.
12/5/2022	DL	0.1	\$450.00	\$45.00	Review joint defense agreement
12/5/2022	DL	0.4	\$450.00	\$120.00	Correspondence with atty, Shalit, Roa, and client regarding and attaching fully executed joint cooperation agreement; correspondence with attys regarding appearance before USDJ Chen tomorrow; correspondence with private investigator regarding conference; conference with attys regarding strategy; correspondence with attys regarding invoices from forensic examiner.
12/6/2022	DL	0.4	\$450.00	\$180.00	Interoffice meeting with E. Kataev

12/6/2022	DL	1.5	\$450.00	\$675.00	Conference with private investigator regarding developments of [REDACTED]; correspondence with attys regarding questionable charges in bills; review voice message from private investigator; conference with attys regarding same; conference with private investigator and attys regarding developments with [REDACTED] and private investigator most likely hired by Defendants; review ECF bounce from Court with USDJ minute entry for proceedings held on pre-motion conference; correspondence with BRG and client regarding payment; conference and correspondence with client regarding John Doe lawsuit in federal court and lack of subject matter jurisdiction for same; [REDACTED] [REDACTED]
12/6/2022	DL	1.5	\$450	\$675	Travel time.
12/7/2022	DL	1.2	\$450.00	\$540.00	review proposed correspondence to forensic analyst conference with attys regarding strategy on pre-action disclosure; review verified petition and related papers; correspondence with attys and Roa's new counsel regarding pre-action disclosure special proceeding; correspondence with attys regarding proposed correspondence to forensic analyst; review correspondence with Roa's new counsel regarding letterhead for preservation letters; conference with private investigator regarding status of case; conference with attys regarding logistical issues; conference regarding preservation letters; conference with private investigator regarding same; correspondence with private investigator regarding video; correspondence with private investigator and client regarding items for letter;
12/8/2022	DL	1	\$450.00	\$450.00	review Correspondence with Roa's additional counsel regarding letterhead and conference; t virtual meeting with Roa's additional counsel; review correspondence from forensic analyst addressing points; correspondence with cattys regarding contents and conference to discuss same;t virtual meeting to review and respond to forensic analyst's response; correspondence with private investigator and attys regarding revisions to petition for pre-action disclosure; review correspondence with Roa's additional counsel regarding error in petition;
12/10/2022	DL	0.2	\$450.00	\$90.00	review Correspondence with private investigator regarding update on investigation; review correspondence with private investigator regarding billing; correspondence with Roa and attys regarding question by investigator;
12/11/2022	DL	0.1	\$450.00	\$45.00	review Correspondence with client regarding invoice from private investigator.

12/12/2022	DL	1.5	\$450.00	\$675.00	review Correspondence with additional counsel for Roa regarding appearance on Order to show cause, subpoenas, and service by publication, and signed Order to show cause; virtual meeting with private investigator; review correspondence with private investigator regarding Stanulis; review correspondence with private investigator regarding device information; review correspondence with private investigator regarding photos of Safa & Vito; [REDACTED]; review correspondence with private investigator regarding picture of device with serial number; review preservation letter to Land Air Sea with private investigator during virtual conference;
12/13/2022	DL	0.3	\$450.00	\$135.00	review Correspondence with private investigator regarding address for Stanulis; review correspondence with court reporter and opposing counsel regarding transcript fee; [REDACTED]; review correspondence with Roa's additional counsel, regarding executed subpoena; correspondence with attys, Roa, and his additional counsel regarding Roa's additional counsel unavailability; conference with atty regarding private investigator payments
12/14/2022	DL	0.6	\$450.00	\$270.00	Correspondence with atty regarding reimbursement for private investigator; review correspondence with Roa's additional counsel regarding Order to show cause; review correspondence with court reporter and opposing counsel regarding transcript; review correspondence with private investigator and atty regarding request to serve subpoena; review voice message from private investigator; review correspondence with Roa's additional counsel regarding conference to discuss case; correspondence and conference with private investigator regarding strategy; correspondence with Roa and client regarding pictures of Defendants' henchmen.
12/17/2022	DL	0.3	\$450.00	\$135.00	review correspondence and conference with forensic analyst regarding billing, correspondence with attys regarding Defendants' contact with our customers.
12/20/2022	DL	1	\$450.00	\$450.00	Correspondence with Roa and atty regarding [REDACTED]; correspondence with atty regarding pre-virtual meeting conference; conference with private investigator regarding Stanulis license; review draft subpoena to NYSDOS Division of Licensing Services; correspondence with attys and Roa regarding financials comparison between WatchDog & Companions; conduct pre-virtual meeting conference with atty; ; review voice messages from private investigator; review correspondence with private investigator regarding conference; conference with private investigator and client regarding interview of Stanulis; review correspondence with private investigator regarding composition book and preservation of same;

12/21/2022	DL	1	\$450.00	\$450.00	review Correspondence with client and Roa regarding breakdown of sales by customer between our client and Defendants; review correspondence with additional counsel for Roa regarding virtual meeting; virtual meeting with Roa's additional counsel regarding status, developments, and next steps; ; correspondence with attys
12/23/2022	DL	0.9	\$450.00	\$405.00	Ereview correspondence with Roa's additional counsel regarding contact by Stanulis' attorney for conference; review correspondence with client and private investigator regarding same; conference with private investigator regarding strategy with Stanulis; conference with Stanulis;
12/25/2022	DL	1	\$450.00	\$450.00	correspondence with attys regarding Defendants' formation of IME GuardDog Inc and related matters; review documents on Relativity; correspondence with attys regarding specific set of documents consisting of training materials utilized by Defendants; review correspondence with private investigator regarding moving conference; review correspondence with Roa's additional counsel regarding same; .
12/26/2022	DL	1	\$450.00	\$450.00	R correspondence with atty regarding [REDACTED]; review correspondence with Roa's additional counsel regarding service by publication; review correspondence from Roa's additional counsel to counsel for Stanulis; review correspondence with Roa's additional counsel and private investigator regarding conference to discuss plan for call with Stanulis' counsel; conduct conference with Roa's additional counsel and private investigator to prepare for call; correspondence with Roa's additional counsel regarding same; calendar conference with Stanulis' counsel; conduct conference with Stanulis' counsel, Roa's additional counsel, and private investigator; conduct post-mortem conference with private investigator; conference with Roa's additional counsel; conference with atty regrding update on Stanulis; review correspondence with Roa's additional counsel regarding coordination of deposition date; correspondence with forensic analyst and opposing counsel regarding discovery and download functionality on Relativity;
12/28/2022	DL	1	\$450.00	\$450.00	Correspondence with attys
12/29/2022	DL	1.4	\$450.00	\$630.00	review Correspondence with Roa's additional counsel regarding Stanulis' deposition start time; correspondence with atty regarding strategy email;
1/2/2023	DL	0.4	\$450.00	\$180.00	review Correspondence with atty, Roa, and JSF regarding [REDACTED] [REDACTED] conference and correspondence with Shalit regarding letter motion to compel discovery; correspondence with Shalit and opposing counsel regarding responses to Roa's discovery demands; correspondence with atty forwarding email from process server regarding cost of service by publication;

1/4/2023	DL	0.2	\$450.00	\$90.00	Conference with atty regarding case and developments; review correspondence with Roa's additional counsel and process server regarding service by publication.
1/5/2023	DL	0.5	\$450.00	\$225.00	review correspondence with Roa's additional counsel regarding oral argument on Order to show cause; conference regarding status of appearance before Justice Alomar; [REDACTED]
1/7/2023	DL	0.3	\$450.00	\$135.00	review correspondence with Roa's additional counsel regarding documents from Stanulis, deposition start time, and advance notification of motion for sanctions for failure to appear; conference with atty regarding strategy, discovery, depositions, and summary judgment.
1/12/2023	DL	0.8	\$450.00	\$360.00	Correspondence with atty, Roa, and intellectual property counsel regarding website comparisons in advance of virtual meeting today;n.
1/13/2023	DL	1	\$450.00	\$450.00	conference with attys
1/18/2023	DL	0.8	\$450.00	\$360.00	review Correspondence with Roa's additional counsel, client, and private investigator regarding motion for contempt; review correspondence with client, Roa's additional counsel, and Roa regarding [REDACTED] concerning quote for service by publication; review correspondence with process server regarding status of service by publication; correspondence with attys regarding relief from service by publication; correspondence with [REDACTED] and client regarding service by publication;
1/24/2023	DL	0.1	\$450.00	\$45.00	Review PI's contract with Safa
1/27/2023	DL	0.4	\$450.00	\$180.00	review Correspondence with Roa's additional counsel, client, and private investigator regarding subpoenas; correspondence with Roa's additional counsel and process server concerning same and whether any attempts were made; review correspondence with private investigator regarding subpoena to Tom Brandon;
2/5/2023	DL	2	\$450.00	\$900.00	Review correspondence with Roa's additional counsel, Roa, and private investigator regarding service of subpoena upon Thomas Brandon; [REDACTED]; conference with private investigator regarding Thomas Brandon; correspondence with private investigator, atty and Roa's additional counsel regarding and attaching subpoena to Thomas Brandon with instructions concerning same and requests for information from Roa's additional counsel; conference with private investigator, and Roa's additional counsel with request to amend and refile subpoena prior to service; review extensive correspondence with Roa's additional counsel, Roa, atty and private investigator regarding provision of recording prior to service of subpoena upon Thomas Brandon;
2/7/2023	DL	0.2	\$450.00	\$90.00	call with atty

2/8/2023	DL	0.2	\$450.00	\$90.00	Conference and correspondence with atty regarding case status, next steps, and regarding strategy concerning pre-action disclosure case
2/9/2023	DL	0.2	\$450.00	\$90.00	Read pre-motion conference letter; e-mail correspondence with E. Kataev
2/10/2023	DL	0.4	\$450.00	\$180.00	call and review docs re injunction motion
2/12/2023	DL	1	\$450.00	\$450.00	call and review docs re injunction motion
2/13/2023	DL	0.3	\$450.00	\$135.00	Review outline for motion for preliminary injunction
2/16/2023	DL	0.5	\$450.00	\$225.00	Review and revise OSC
2/17/2023	DL	0.2	\$450.00	\$90.00	Review memorandum of law in support of Order to show cause for sanctions;
2/17/2023	DL	0.4	\$450.00	\$180.00	Review and revise MOL in support of renewed OSC
2/18/2023	DL	0.6	\$450.00	\$270.00	Correspondence with Roa, regarding Florida property; correspondence regarding revisions to memorandum of law in support of Order to show cause for contempt; conference with atty regarding contempt motion;
2/19/2023	DL	1.3	\$450.00	\$585.00	Correspondence with attyt regarding Order to show cause;
2/21/2023	DL	0.4	\$450.00	\$180.00	Review correspondence with Roa's additional counsel, Roa, and client regarding Stanulis; review ECF bounce from opposing counsel with motion to dismiss cause of action for defamation;continue revising declaration of Roa in support of Order to show cause for contempt.
2/25/2023	DL	0.5	\$450.00	\$225.00	Conference with attys
2/26/2023	DL	1.5	\$450.00	\$675.00	conference with a atty regarding action items; regarding questions to Stanulis and subpoena to Division of Licensing Services; conference with Roa, private investigator, a
2/27/2023	DL	1.5	\$450.00	\$675.00	Review and revise reply brief; revise renewed motion for preliminary injunction
3/1/2023	DL	0.2	\$450.00	\$90.00	Correspondence with counseing documents;
3/2/2023	DL	2.5	\$450.00	\$1,125.00	Conference call atty, review motion for attachment
3/3/2023	DL	0.2	\$450.00	\$90.00	Correspondence with atty regarding revisions to proposed Order to show cause;
3/3/2023	DL	1	\$450.00	\$450.00	review motion for attachment
3/5/2023	DL	0.1	\$450.00	\$45.00	Correspondence with atty regarding Order to show cause for contempt.
3/7/2023	DL	1	\$450.00	\$4,450.00	Review and revise renewed motion for injunction;
3/8/2023	DL	1.6	\$450.00	\$720.00	Review and revise memorandum of law in support of renewed motion for injunction
3/8/2023	DL	1	\$450.00	\$450.00	review and revise Roa's declaration in support; [REDACTED]; review and revise memorandum of law in support;
3/9/2023	DL	1.2	\$450.00	\$540.00	Review and revise memorandum of law in support of renewed injunction and declarations

3/10/2023	DL	1.2	\$450.00	\$540.00	Final revisions to memorandum of law and declarations in support of renewed motion for injunction;
3/10/2023	DL	2	\$450.00	\$900.00	Correspondence atty re motion for contempt
3/11/2023	DL	0.2	\$450.00	\$90.00	call with atty
3/12/2023	DL	1.5	\$450.00	\$675.00	Correspondence with atty regarding case; calendar hearing and motion submission deadlines; Land Air Sea Systems; prepare addendum for Land Air Sea Systems.
3/13/2023	DL	0.9	\$450.00	\$405.00	meeting with atty [REDACTED]
3/13/2023	DL	1	\$450.00	\$450.00	Correspondence with counsel
3/14/2023	DL	1	\$450.00	\$450.00	Correspondence with atty regarding strategy and efforts to obtain proof of violations of the temporary restraining Order; discuss forwarding Land Air Sea subpoena materials received; correspondence with Roa, private investigator,
3/15/2023	DL	1	\$450.00	\$450.00	R call with atty
3/17/2023	DL	0.5	\$450.00	\$225.00	Review opposition to motion for renewed injunction
3/17/2023	DL	1.5	\$450.00	\$675.00	Review correspondence with Roa, and atty re declaration of [REDACTED] to show violation of temporary restraining Order; conference; conference with private investigator regarding strategy and upcoming meeting;
3/19/2023	DL	2	\$450.00	\$900.00	Conduct strategy meeting with atty and private investigator;
3/20/2023	DL	1	\$450.00	\$450.00	Correspondence with atty
3/22/2023	DL	1.5	\$450.00	\$675.00	Review reply in further support of renewed motion for injunction;
3/22/2023	DL	2	\$450.00	\$900.00	review reply memorandum of law in further support of second motion for injunctive relief;
3/23/2023	DL	1.5	\$450.00	\$675.00	Correspondence with atty regarding meeting to prepare motion binders; conference with private investigator regarding hearing preparation;
3/24/2023	DL	1	\$450.00	\$450.00	conference with attys
3/25/2023	DL	2.5	\$450.00	\$1,125.00	Prepare for hearing
3/25/2023	DL	2	\$450.00	\$900.00	Correspondence with atty and Roa regarding exhibits;
3/26/2023	DL	3	\$450.00	\$1,350.00	Prepare for hearing
3/26/2023	DL	3	\$450.00	\$1,350.00	Review ECF bounce from Court with USDJ Order granting letter motion to compel; correspondence atty and private investigator regarding meeting location for pre-hearing strategy session;
3/27/2023	DL	1	\$450.00	\$450.00	review oral argument outline
3/27/2023	DL	2	\$450	\$900.00	Travel time.
3/27/2023	DL	4	\$450	\$1,800	

88.8

\$43,870.00